

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL, APRIL
MUNIZ, HANNAH PEARCE, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, and JOHN DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a/ ELI MOSLEY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS,
LEAGUE OF THE SOUTH, JEFF SCHOEP,
NATIONAL SOCIALIST MOVEMENT,
NATIONALIST FRONT, AUGUSTUS SOL
INVICTUS, FRATERNAL ORDER OF THE
ALT-KNIGHTS, MICHAEL “ENOCH”
PEINOVICH, LOYAL WHITE KNIGHTS OF
THE KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3:17-cv-00072-NKM

**SUPPLEMENT TO MOTION FOR SANCTIONS AGAINST DEFENDANTS ELLIOT
KLINE A/K/A ELI MOSLEY AND MATTHEW HEIMBACH**

On April 3, 2019, Plaintiffs filed a Motion for Sanctions against Defendants Elliot Kline and Matthew Heimbach, noting, among other things, the flagrant disrespect Defendant Heimbach shows the judicial process by continuing to comment actively on social media from the very accounts he refuses to disclose in this litigation. (ECF No. 457.) As if on cue, shortly after the motion was submitted, Defendant Heimbach posted another disturbing message on Twitter, which Plaintiffs seek to submit as an additional exhibit to the recently filed motion. Heimbach's tweet concerned a story reported by various outlets that a distinctive white power symbol specifically promoted by Heimbach was discovered at the scene of a recent arson attack on a Tennessee civil rights center, known for its connection to Dr. Martin Luther King, Jr. Heimbach retweeted the story, sharing it with his followers, while appending his own sarcastic caption: "Well, this is awkward." (Ex. 27 (Heimbach Tweet).) This is further evidence of Heimbach's bad faith, as he continues to use his computer and/or smart phone to publicly speak about racially-motivated violence while at the same time ignoring his discovery obligations and the orders of this Court. Plaintiffs respectfully request that the attached exhibit be incorporated into our Motion for Sanctions against Defendants Kline and Heimbach and that the Court order the requested relief.

Dated: April 5, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 5, 2019, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

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Jason Kessler, Vanguard America, Nathan
Damigo, Identity Europa, Inc. (Identity
Evropa), and Christopher Cantwell*

I further hereby certify that on April 5, 2019, I also served the following non-ECF participants, via U.S. mail, First Class and postage prepaid, addressed as follows:

Loyal White Knights of the Ku Klux Klan
a/k/a : Loyal White Knights Church of
the Invisible Empire, Inc.
c/o Chris and Amanda Barker
2634 U.S. HWY 158 E
Yanceyville, NC 27379

Moonbase Holdings, LLC
c/o Andrew Anglin
P.O. Box 208
Worthington, OH 43085

Andrew Anglin
P.O. Box 208
Worthington, OH 43085

East Coast Knights of the Ku Klux Klan
a/k/a East Coast Knights of the
True Invisible Empire
26 South Pine St.
Red Lion, PA 17356

Fraternal Order of the Alt-Knights
c/o Kyle Chapman
52 Lycett Circle
Daly City, CA 94015

Augustus Sol Invictus
9823 4th Avenue
Orlando, FL 32824

I further hereby certify that on April 5, 2019, I also served the following non-ECF participants, via electronic mail, as follows:

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Matthew Heimbach
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